

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

SERVICE EMPLOYEES	:	<b>Case No. 2:12 cv 562</b>
INTERNATIONAL UNION, LOCAL 1;	:	
UNITED STEEL, PAPER AND	:	
FORESTRY, RUBBER,	:	
MANUFACTURING, ENERGY, ALLIED	:	<b>JUDGE GEORGE C. SMITH</b>
INDUSTRIAL AND SERVICE	:	
WORKERS INTERNATIONAL UNION;	:	<b>Magistrate Judge Mark R. Abel</b>
INTERNATIONAL UNION, UNITED	:	
AUTOMOBILE, AEROSPACE AND	:	<b>DECLARATION OF CAROLINE H.</b>
AGRICULTURAL IMPLEMENT	:	<b>ENTRY IN SUPPORT OF</b>
WORKERS OF AMERICA, LOCAL	:	<b>PLAINTIFFS' MOTION FOR</b>
1005; and INTERNATIONAL UNION,	:	<b>PRELIMINARY INJUNCTION</b>
UNITED AUTOMOBILE, AEROSPACE	:	
AND AGRICULTURAL IMPLEMENT	:	<b>CLASS ACTION</b>
WORKERS OF AMERICA, LOCAL 863,	:	
and OHIO ORGANIZING	:	
COLLABORATIVE,	:	
	:	
Plaintiffs	:	
	:	
vs.	:	
	:	
JON HUSTED, in his official capacity as	:	
Secretary of State of Ohio; TIMOTHY M.	:	
BURKE, in his official capacity as member	:	
of the Hamilton County Board of Elections	:	
and on behalf of similarly situated	:	
members of county boards of elections;	:	
JEFF HASTINGS, in his official capacity	:	
as member of the Cuyahoga County Board	:	
of Elections and on behalf of similarly	:	
situated members of county boards of	:	
elections; and DOUGLAS J. PREISSE, in	:	
his official capacity as member of the	:	
Franklin County Board of Elections and on	:	
behalf of similarly situated members of	:	
county boards of elections,	:	
	:	
Defendants.	:	

**DECLARATION OF CAROLINE H. GENTRY**

I, Caroline H. Gentry, declare the following based upon my personal knowledge:

1. I am the trial attorney for plaintiffs Northeast Ohio Coalition for the Homeless (“NEOCH”) and Service Employees International Union (“SEIU”) Local 1199 in the case captioned *NEOCH v. Husted*, filed in the United States District Court for the Southern District of Ohio, Eastern Division, as Case No. 2:06CV896 (the “*NEOCH*” case). In the *NEOCH* case, plaintiffs challenge Ohio laws and policies which result in the rejection of provisional ballots cast by persons voting without ID for reasons plaintiffs allege violate the Equal Protection Clause and Due Process Clause of the United States Constitution.

2. Attached hereto as Exhibit A is a true and correct copy of the Consent Decree entered in the *NEOCH* case on April 19, 2010. By agreement of all parties and with the approval of the court, the Consent Decree resolved plaintiffs’ claims under the conditions existing at that time.

3. I am also the trial attorney for Intervenor-Plaintiff NEOCH in the case captioned *Hunter v. Hamilton County Board of Elections*, filed in the United States District Court for the Southern District of Ohio, Western Division, as Case No. 1:10CV820 (the “*Hunter*” case). NEOCH intervened in the *Hunter* case to enforce the Consent Decree with respect to the handling of provisional ballots rejected by the Hamilton County Board of Elections in connection with the 2010 general election. Beginning on July 18, 2011, attorneys from my law firm, Porter, Wright, Morris & Arthur LLP, participated in a multi-day permanent injunction hearing before Chief Judge Susan J. Dlott under my supervision. Over the course of the hearing, plaintiffs presented testimony from numerous poll workers, voters, and election officials.

4. On February 8, 2012, Judge Dlott issued a decision in *Hunter* on plaintiffs' request for a permanent injunction. That decision is available on Westlaw at 2012 WL 404786 and a true and correct copy of the Westlaw decision is attached hereto as Exhibit B.

5. My law office received copies of the court reporter's transcripts of the permanent injunction hearing held before Judge Dlott. True and correct copies of excerpts of these transcripts are attached as exhibits to this Declaration.

6. Attached hereto as Exhibit C is a true and correct copy of excerpts of testimony by Sally Krisel, who at the time was the director of Hamilton County Board of Elections.

7. Attached hereto as Exhibit D is a true and correct copy of excerpts of testimony by Timothy Burke, who at the time of testimony was a member of the Hamilton County Board of Elections and had served in that capacity for close to eighteen years.

8. Attached hereto as Exhibit E is a true and correct copy of excerpts of testimony by Mary Horton, a poll worker in Hamilton County during the November 2010 election.

9. Attached hereto as Exhibit F is a true and correct copy of excerpts of testimony by Linda Claborn, a poll worker in Hamilton County during the November 2010 election.

10. Attached hereto as Exhibit G is a true and correct copy of excerpts of testimony by Atiya Hampton, a poll worker in Hamilton County during the November 2010 election.

11. Attached hereto as Exhibit H is a true and correct copy of excerpts of testimony by William Singer, a poll worker in Hamilton County during the November 2010 election.

12. Attached hereto as Exhibit I is a true and correct copy of excerpts of testimony by Derek Moore, a poll worker in Hamilton County during the November 2010 election.

13. Attached hereto as Exhibit J is a true and correct copy of excerpts of testimony by Eddie Strauss, a poll worker in Hamilton County during the November 2010 election.

14. Attached hereto as Exhibit K is a true and correct copy of excerpts of testimony by Sherman Lynem, a poll worker in Hamilton County during the November 2010 election.

15. Attached hereto as Exhibit L is a true and correct copy of excerpts of testimony by Sharron Moon, a poll worker in Hamilton County during the November 2010 election.

16. Attached hereto as Exhibit M is a true and correct copy of excerpts of testimony by Lawrence Rouse, a poll worker in Hamilton County during the November 2010 election.

17. Attached hereto as Exhibit N is a true and correct copy of excerpts of testimony by Cecelia Johnson Hall-Muhammad, a poll worker in Hamilton County during the November 2010 election.

18. Attached hereto as Exhibit O is a true and correct copy of excerpts of testimony by Vicki Lee Williams, a poll worker in Hamilton County during the November 2010 election.

19. Attached hereto as Exhibit P is a true and correct copy of excerpts of testimony by Timothy Mark Patterson, a poll worker in Hamilton County during the November 2010 election.

20. Attached hereto as Exhibit Q is a true and correct copy of excerpts of testimony by Regina Jackson, a poll worker in Hamilton County during the November 2010 election.

21. Attached hereto as Exhibit R is a true and correct copy of excerpts of testimony by Donald Gehring, a poll worker in Hamilton County during the November 2010 election.

22. Attached hereto as Exhibit S is a true and correct copy of excerpts of testimony by Anna Johnson, a poll worker in Hamilton County during the November 2010 election.

23. Attached hereto as Exhibit T is a true and correct copy of excerpts of testimony by Earlie Thrash, a poll worker in Hamilton County during the November 2010 election.

24. Attached hereto as Exhibit U is a true and correct copy of excerpts of testimony by Joseph Brenner, a poll worker in Hamilton County during the November 2010 election.

25. Attached hereto as Exhibit V is a true and correct copy of excerpts of testimony by Camilla Steward, a poll worker in Hamilton County during the November 2010 election.

26. Attached hereto as Exhibit W is a true and correct copy of excerpts of testimony by Joan Flannery, a poll worker in Hamilton County during the November 2010 election.

27. Attached hereto as Exhibit X is a true and correct copy of excerpts of testimony by Dayle Chandler, a poll worker in Hamilton County during the November 2010 election.

28. Attached hereto as Exhibit Y is a true and correct copy of excerpts of testimony by Maeora Thomas, a poll worker in Hamilton County during the November 2010 election.

29. Attached hereto as Exhibit Z is a true and correct copy of excerpts of testimony by Kevin Tubbs, a poll worker in Hamilton County during the November 2010 election.

30. Attached hereto as Exhibit AA is a true and correct copy of excerpts of testimony by Michael Nichols, a poll worker in Hamilton County during the November 2010 election.

31. Attached hereto as Exhibit BB is a true and correct copy of excerpts of testimony by Kerrie Yates, a poll worker in Hamilton County during the November 2010 election.

32. Attached hereto as Exhibit CC is a true and correct copy of excerpts of testimony by James Jacobs, a poll worker in Hamilton County during the November 2010 election.

33. Attached hereto as Exhibit DD is a true and correct copy of excerpts of testimony by Michelle Jackson, a poll worker in Hamilton County during the November 2010 election.

34. Attached hereto as Exhibit EE is a true and correct copy of excerpts of testimony by Caretta Haynes, a poll worker in Hamilton County during the November 2010 election.

35. Attached hereto as Exhibit FF is a true and correct copy of excerpts of testimony by Jacob Hartmann, a poll worker in Hamilton County during the November 2010 election.

36. Attached hereto as Exhibit GG is a true and correct copy of excerpts of testimony by Christine Shivers, a poll worker in Hamilton County during the November 2010 election.

37. Attached hereto as Exhibit HH is a true and correct copy of excerpts of testimony by Tyrallynn Carter, a poll worker in Hamilton County during the November 2010 election.

38. Attached hereto as Exhibit II is a true and correct copy of excerpts of testimony by Rene Kennedy, a poll worker in Hamilton County during the November 2010 election.

39. Attached hereto as Exhibit JJ is a true and correct copy of excerpts of testimony by Pamela Crooms, a poll worker in Hamilton County during the November 2010 election.

40. Attached hereto as Exhibit KK is a true and correct copy of excerpts of testimony by Anita Brown, a poll worker in Hamilton County during the November 2010 election.

41. Attached hereto as Exhibit LL is a true and correct copy of excerpts of testimony by Paulette Thompson, a poll worker in Hamilton County during the November 2010 election.

42. Attached hereto as Exhibit MM is a true and correct copy of excerpts of testimony by Olivia Yarbrough, a poll worker in Hamilton County during the November 2010 election.

43. Attached hereto as Exhibit NN is a true and correct copy of excerpts of testimony by Veronica Byrd, a poll worker in Hamilton County during the November 2010 election. Although the document header describes these pages as "Yarbrough - Cross", the document text indicates that it is the testimony of Veronica Byrd.

44. Attached hereto as Exhibit OO is a true and correct copy of excerpts of testimony by Caleb Faux, who at the time of testimony was a member of the Hamilton County Board of Elections.

45. Attached hereto as Exhibit PP is a true and correct copy of excerpts of testimony by Joyce Lovette, a poll worker in Hamilton County during the November 2010 election.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

  
Caroline H. Gentry

Executed this 20th day of June, 2012.